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7

8 UNITED STATES DISTRICT COURT
9 DISTRICT OF NEVADA

10 CELY TABLIZO,

11 Plaintiff,

12 vs.

13 CITY OF LAS VEGAS, a political entity,
DOES 1-10, inclusive; ROE
14 CORPORATIONS 1-10, inclusive,

15 Defendant.

CASE NO. 2:14-cv-00763-APG-VCF

16 **STIPULATION AND REQUEST TO EXTEND DISPOSITIVE MOTION DEADLINE**
17 **(Fourth Request)**

18 IT IS HEREBY STIPULATED AND AGREED by and between Plaintiff CELY
19 TABLIZO, by and through her attorney KIRK T. KENNEDY, ESQ., and the Defendant CITY
20 OF LAS VEGAS, by and through its attorney JACK O. ESLINGER, ESQ., Deputy City
21 Attorney, that the parties request that this Court extend the deadline for Dispositive Motions to
22 July 20, 2015. This is the fourth request by stipulation to extend this deadline.

23 **DESCRIPTION OF ACTION:** This is a gender discrimination based action under Title
24 VII, as well as a consolidated FMLA discrimination action. The Defendant has denied all claims
25 for relief.

26 1. **Reasons Why the Parties Need Additional Time to File Dispositive Motions:**

27 On Monday, June 22, 2015, the City of Las Vegas received the deposition transcripts of
28 Michael Scalzi and Paula Adams taken on February 11, 2015. These transcripts are required to

1 draft its dispositive motion which is currently due on July 29, 2015. Additionally, counsel for
 2 the City of Las Vegas will be out of the office during the week of June 29, 2015. The following
 3 list of the current dispositive motions deadlines and parties' proposed
 4 extended deadlines:

| Scheduled Event | Current Deadline | Proposed Deadline |
|----------------------|------------------|------------------------|
| Dispositive Motions | June 29, 2015 | July 20, 2015 |
| Joint Pretrial Order | July 29, 2015 | August 20, 2015 |

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 9 The Pretrial Order shall be filed by August 20, 2015, which is not more than thirty (30)
 10 days after the date set for filing dispositive motions in this case. This deadline is suspended if
 11 dispositive motions are timely filed and, in such case, the deadline for filing the pretrial order
 12 shall be thirty (30) days after decision on said dispositive motions, or by further order of the
 13 court. The disclosures required by FRCP Rule 26 (a)(3) shall be made in the joint pretrial order.

14 This Request for an extension of time is not sought for any improper purpose or other
 15 purpose of delay. Rather, it is sought by the parties solely for the purpose of allowing sufficient
 16 time to file dispositive motions in this case and adequately prepare their respective cases for trial.

17 This is the fourth request for extension of time to file dispositive motions in this matter.
 18 The parties respectfully submit that the reasons set forth above constitute compelling reasons for
 19 the additional extension.

20 WHEREFORE, the parties respectfully request that this Court extend the deadline to file

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1 Dispositive Motions to July 20, 2015, and the deadline to file the Joint Pretrial Order to August
2 20, 2015.

3 DATED this 23rd day of June, 2015.

DATED this 23rd day of June, 2015.

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5 BRADFORD R. JERBIC
City Attorney

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Attorney for Plaintiff

11 **ORDER**

12 IT IS SO ORDERED.

13 DATED this 24th day of June, 2015.

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16 UNITED STATES MAGISTRATE JUDGE